

Application No.: 09/517952

Docket No.: MWS-037RCE2

**REMARKS**

Upon entry of this amendment, claims 1-2, 4-20, 22-36, and 38-53 are pending, of which claims 1, 19, 35, and 53 are independent. Claims 1, 17, 19, 33, 35, 52, and 53 are amended. No new matter is added. Applicants respectfully submit that the pending claims define over the art of record.

**Claim Rejection of Claims 1-2, 4-9, 11-20, 22-27, 29-36, 38-43, and 45-53**

Claims 1-2, 4-9, 11-20, 22-27, 29-36, 38-43, and 45-53 are rejected under 35 U.S.C. §103(a) as being unpatentable over "A Knowledge Based Electronic Information and Documentation System", ACM, 2000 by Young et al. (hereafter "Young") in view of "SGML nets: Integrating Document and Workflow Modeling", IEEE, 1998 by Weitz (hereafter "Weitz") further in view of United States Patent No. 6,101,489 to Lannert et al. (hereafter "Lannert"). Applicants respectfully submit that the combination of Young, Weitz, and Lannert does not teach or suggest each and every element of independent claims 1, 19, 35, and 53. At least, the combination of references does not teach or suggest the limitation of bi-directional communication between a reporting component and a concurrent simulation of a model.

The Examiner suggests on Page 6 and 30 of the Final Office Action dated April 19, 2005 that it would have been obvious to one of ordinary skill in the art "to combine the system of Young et al. including at least one of the reporting components configured to define an operation to bi-directionally communicate with a technical computing environment with the system of Lannert et al. that included interface components configured to define an operation to bi-directionally communicate with a simulation of a model during an execution of the simulation" to achieve the claim invention of bi-directional communication between at least one reporting component and a simulation of a model. Applicants respectfully disagree.

Without considering the validity of the Examiner's statements regarding Young and Lannert, Applicants respectfully submit that there is error in the Examiner's logic to conclude that the combination of Young and Lannert would result in the teaching or suggestion of bi-directional communication between a reporting component and a simulation of a model. If Young teaches bi-directional communication between a reporting component and a technical computing environment and Lannert teaches bi-directional communication between a user interface component and a simulation of a model, the combination of Young and Lannert does

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not yield bi-directional communication between a reporting component and a simulation of a model.

Furthermore, Applicants respectfully submit that Young only discusses generation of reports and does not teach or suggest reporting components, not to mention reporting component that can be assembled to form a template, as required by independent claims 1, 18, 35, and 53. Furthermore, the pending claims require the reporting components being configurable to define one or more operations to perform within a technical computing environment. Applicants respectfully submit that there are many ways to generate a report, and a reporting component is not an inherent element or feature in generating a report. Furthermore, Applicants respectfully submit that the report generator of Young does not bi-directionally communicate with the technical environment. Nowhere in the Young reference does the report query the technical environment for information. Applicants respectfully submit that Young merely teaches generation of reports from outputs of a run of the system.

Additionally, Applicants respectfully submit that there is no similarity between a reporting component and a user interface component in Lannert. Although Lannert does mention generation of reports, Lannert does not teach or suggest reporting components that may be used to form a template, as required by the pending claims. Therefore, Applicants respectfully submit that the combination of Young and Lannert fails to teach or suggest the limitation of bi-directional communication between a reporting component and a concurrent simulation of a model, as required by independent claims, 1, 19, 35, and 53.

Additionally, Weitz fails to cure the deficiency of the combination of Young and Lannert. Weitz discusses the use of SGML nets for document management. Nowhere does Weitz mention simulation of a model. Therefore, Weitz also does not teach or suggest bi-directional communication between a reporting component and a concurrent simulation of a model. Hence, the combination of Young, Lannert, and Weitz does not teach or suggest the limitation of bi-directional communication between a reporting component and a concurrent simulation of a model, as required by independent claims 1, 19, 35, and 53.

Applicants respectfully submit that there is no motivation to combine the teachings of Young, Lannert, and Weitz. Young is directed to a knowledge-based electronic information and documentation system and reports are generated to document the transformation an input

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specification underwent in becoming code. One of ordinary skill in the art will not be motivated to modify Young to include simulation of models as Young is focused on code documentation and not simulation. Lannert is directed to an educational system that provides a user with a simulated business environment that allows the user to experience realistic activities and real world consequences for the user's actions and decisions. Weitz is directed to document management using SGML nets. Therefore, one of ordinary skill in the art will not be motivated to combine three different and hardly related topics of technology.

Accordingly, Applicants respectfully request that the Examiner reconsider and withdraw the rejection of independent claims 1, 19, 35, and 53. Applicants note that the dependent claims also have separate patentable subject matter. In one example, dependent claims 4, 22, and 38 include the limitation a reporting component configured to perform the operation of issuing instructions to the computing environment. Lannert merely teaches a user may enter inputs to the user interface to guide a simulation. However, nowhere does Lannert teach or suggest a reporting component issues instructions to a computing environment. Furthermore, the combination of Young, Lannert, and Weitz also does not teach or suggest a reporting component issuing instructions to a computing environment. In another example, dependent claims 17, 33, and 52 includes the limitation that the reporting components are defined according to an object-oriented programming language. The Examiner speculated on Page 18 of the Final Office Action dated April 19, 2005 that Lannert teaches report components are defined according to an object-orientated programming language. However, the cited sections merely discuss the possibility of using object oriented programming language to design the educational system that provides a user with a simulated business environment. Although reports may be generated to review a user's performance, nowhere does Lannert teach or suggest the use of reporting components to form a report. Therefore, Applicants respectfully submit that Lannert does not teach or suggest that the reporting components are defined according to an object-orientated programming language.

Accordingly, Applicants respectfully request that the Examiner reconsider and withdraw the rejection of dependent claims 2, 4-9, 11-18, 20, 22-27, 29-34, 36, 38-43, and 45-52.

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**Claim Rejection of Claims 10, 28, and 44**

Claims 10, 28, and 44 are rejected under 35 U.S.C. §103(a) as being unpatentable over Young in view of Weitz, and further in view of Lannert and "A Prototype Notebook-Based Environment for Computational Tools", IEEE 1998 by Skidmore et al. (hereafter "Skidmore").

Claims 10, 28, and 44 depend on independent claims 1, 19, and 35, respectively. As set forth above, the combination of Young, Lannert, and Weitz fails to teach or suggest each and every limitation of independent claims 1, 19, and 35, and at least the limitation of bi-directional communication between a reporting component and a concurrent simulation of a model. Applicants respectfully submit that Skidmore also fails to cure the deficiency of the combination of Young, Lannert, and Weitz.

Skidmore is directed to a platform independent, web-based version of a notebook and further provides support for collaboration and other scientific activities across distributed computing platforms. Nowhere does Skidmore discuss anything about bi-directional communication between reporting components and a concurrent simulation of a model. Additionally, Applicants respectfully submit that Skidmore does not teach or suggest the limitation that a reporting component configured to perform the operation of issuing commands to simulate a model as speculated by the Examiner on Page 25 of the Final Office Action dated April 19, 2005. The cited section in Skidmore by the Examiner merely discusses an experimental control component that is split into an experiment builder and execution controller, but there is no reporting components or equivalents. Furthermore, as set forth above, there is no motivation for one of ordinary skill to combine Young, Lannert, and Weitz, hence, there is even less motivation for one of ordinary skill to combine a fourth unrelated topic of technology, Skidmore, with Young, Lannert, and Weitz. Additionally, Applicants respectfully submit that even if four prior art references may be properly combined to achieve the present invention, one of ordinary skill in the art will unlikely find the present invention obvious because of the substantial modification that needs to be made to all of the four prior art references.

Accordingly, Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claims 10, 28, and 44.

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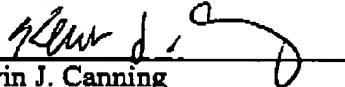
**CONCLUSION**

In view of the above amendment, Applicants believe the pending application is in condition for allowance.

Applicants submit herewith a petition for two-month extension of time and a request for continued examination. Applicants believe no other fee is due with this statement. However, if other fee is due, please charge our Deposit Account No. 12-0080, under Order No. MWS-037RCE2 from which the undersigned is authorized to draw.

Dated: September 19, 2005

Respectfully submitted,

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